

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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Attorney for Debtors
Rolando C. Sousa and Caterina Sousa**

Case No.: 13-12257-MS

Chapter 13

Judge: Honorable Morris Stern

Hearing Date:

In re:

**ROLANDO C. SOUSA and CATERINA
SOUSA,
Debtors**

**DEBTORS' MOTION TO APPROVE SALE
OF DEBTOR'S CONDOMINIUM APARTMENT UNIT 4B
AT 603 WEST 148TH STREET, NEW YORK, NY**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Debtors, Rolando C. Sousa and Caterina Sousa, file the within Motion to Approve the Sale of Debtor's Condominium Apartment located at 603 West 148th Street, Unit 4B, New York, New York (the "Apartment"), pursuant to Sections 105 and 363 of Title 11 of the United States Bankruptcy Code, Rules 2002, 6004 and 9014 of the Federal Rules of Bankruptcy Procedure for an order authorizing: (1) the sale of the real property captioned in the title of this Motion free and clear of liens or interests (the "Proposed Sale"); (2) payment of closing costs related thereto, and legal fees, unpaid real estate taxes and condominium charges, income tax liens, state, city

and real estate transfer taxes, and brokerage commissions; and (3) the provision of claims for Secured Creditor the “Secured Creditor”).

PLEASE TAKE FURTHER NOTICE that the relief sought is based on the attached Affidavit of Thomas J. Romans, Esq. and such further oral and documentary evidence as may be presented at any hearing on the Motion.

PLEASE TAKE FURTHER NOTICE that any objections to the Motion must be made in writing, filed with the Bankruptcy Court, Federal Building, 50 Walnut Street, Courtroom 3A, Newark, New Jersey and served so as to actually be received by the undersigned counsel for the Debtors on or before the deadline filing date noticed on the docket.

A hearing on the Motion will be held before the Honorable Morris Stern at the Bankruptcy Court, Federal Building, 50 Walnut Street, Courtroom 3A, Newark, New Jersey on a date and time to be assigned by this Honorable Court.

If no objection or other response to the motion is timely filed in accordance with the procedures set forth above, the Bankruptcy Court may enter an Order granting the relief sought in the motion without further notice or hearing. No oral argument is requested.

Dated: January 27, 2014

/s/ Thomas J. Romans
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